

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TENNESSEE

DANIEL LOVELACE and HELEN
LOVELACE, Individually, and as Parents of
BRETT LOVELACE, deceased,

Plaintiffs,

vs.

NO.: 2:13-cv-02289 dkv
JURY TRIAL DEMANDED

PEDIATRIC ANESTHESIOLOGISTS, P.A.;
BABU RAO PAIDIPALLI ; and,
MARK P. CLEMONS,

Defendants.

NOTICE OF OBJECTION TO REQUEST FOR PRODUCTION OF DOCUMENTS

Come the Plaintiffs, Daniel Lovelace and Helen Lovelace, Individually, and as Parents of Brett Lovelace, deceased, by counsel, who for their Notice of Objection to Request for Production of Documents, state:

1. Defendants filed Notices to Take Depositions of Plaintiffs' experts, Robert E. "Jay" Marsh [D.E. 109, 110]; Dr. Frank J. Peretti [D.E. 111]; and Dr. Jason Kennedy [D.E. 115], which depositions are allowable by law.
2. These Notices to take said depositions contain requests for documents from Plaintiffs' experts.
3. Said Notices' requests for Plaintiffs' experts to provide documents, items and things do not meet or comply with either Rule 30(b)(2), nor Rule 34(b)(2)(A), F.R.C.P.
4. Defendants are hereby notified that Plaintiffs intend to follow the Federal Rules of Civil Procedure as respects said noticed depositions; however, said documents will not be produced in the

time, form and manner requested, as the document requests do not comply with the aforesaid Rules, and are, therefore, void.

Respectfully submitted,

HALLIBURTON & LEDBETTER

/s/ Mark Ledbetter
MARK LEDBETTER (TN #17627)
Attorney for Plaintiffs
254 Court Avenue, Suite 305
Memphis, TN 38103
(901) 523-8153-phone
(901) 523-8115-fax

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing has been served upon the following counsel of record via the Court's ECF filing system this 9th day of June, 2014:

J. Kimbrough Johnson/Marcy Dodds Magee/Margaret Cooper
2900 One Commerce Square
40 S. Main Street
Memphis, TN 38103
Attorneys for Mark Clemons
901/525-8721-phone
901/525-6722-fax
jjohnson@lewisthomason.com
mmagee@lewisthomason.com
mcooper@lewisthomason.com

Brad Gilmer/Jerry Potter/Karen Poplon
The Hardison Law Firm
119 S. Main Street, Suite 800
Memphis, TN 38103
Attorneys for Babu R. Paidipalli & Pediatric Anesthesiologists, P.A.
901/525-8776 – phone
901/525-8790 – fax
Bgilmer@hard-law.com
jpotter@hard-law.com
kkoplon@hard-law.com

/s/ Mark Ledbetter